

**REMARKS:**

Claims 1 and 2 are in the case and presented for consideration.

Claims 1 and 2 have been amended to limit the invention to the measuring of parameters at the at least two separate locations on a substrate that are perpendicular to the movement direction of the substrate as shown in Fig. 2, and to define the location of the sensing apparatus (claim 1) and step (claim 2) as being spaced from the coating location where the coating takes place, along the direction of movement of the substrates along their cyclic path of movement past the sensing location and past the coating location.

Claims 3 and 4 have been rejected as being obvious from the combination of U.S. Patents 6,402,905 and 6,419,802 to Baldwin et al. This rejection is relevant to consideration of the amended claims 1 and 2.

Neither Baldwin patent teaches or suggests the claim 1 and 2 limitations of the invention to the perpendicular side-by-side sensors of Fig. 2 and, also, to space them along the movement path of the substrates from the coating or the treatment location that is clearly shown in Fig. 2. The claims also call for the movement to be cyclical past the coating or treatment station and along the path. These are important and unobvious distinctions over the combination of the U.S. patents to Baldwin since the combination of local coating with spaced apart perpendicular sensors produces new and advantages effects over Baldwin, for example, by more accurately measuring the thickness at a location away from the disturbances of the coating process and, thus, adjusting the coating parameters more accurately. Both Baldwin patents disclose a generalized coating process that coats all substrates on the carousel indiscriminately, particularly, in U.S. Patent 6,402,905 that shows a source located at the axis of rotation of the carousel for applying coating on all substrates. The perpendicular sensors 16 in Baldwin '905 must operate

within the coating process. In U.S. Patent 6,419,802 to Baldwin, the coating process is at the side of the carousel as shown in Fig. 1A, while the sensing process takes place on the other side. This sensing process, however, does not include two sensors that are perpendicular to the movement of the substrates along the cyclic path.

The comments of an expert in this field in the form of the attached Rule 132 Declaration are also offered to help further prove the patentability of the claims invention, particularly in view of the Supreme Court case of *KSR v. Teleflex* and the corresponding Guidelines of MPEP 2141.

The claims are therefore believed to be patentably distinct over any combination of the Baldwin patents and the application and claims are believed to be in condition for allowance.

The Examiner is respectfully invited to telephone the undersigned if any matters remain and favorable action is respectfully requested.

Respectfully submitted,  
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